

CRUSER, MITCHELL, NOVITZ, SANCHEZ, GASTON & ZIMET, LLP

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SINOWA JOHNSON,

Plaintiff,

v.

NJ TRANSIT BUS OPERATIONS INC. d/b/a/
NJ TRANSIT AND ATU LOCAL 880,

Defendants.

Hon. Karen M. Williams, U.S.D.J.
Hon. Elizabeth A. Pascal, U.S.M.J.

Civil Action No. 1:25-02528 (KMW/EAP)

NOTICE OF MOTION

TO: Hon. Elizabeth A. Pascal, U.S.M.J.
United States District Court
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets, Courtroom 4A
Camden, New Jersey 08101

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Attorneys for ATU Local 880

PLEASE TAKE NOTICE that on **Tuesday, September 2, 2025**, or as soon thereafter as counsel may be heard, Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP (Travis M. Anderson, Esq., appearing), attorneys for Defendant, New Jersey Transit Bus Operations, Inc. (“Defendant”), will apply to the Honorable Elizabeth A. Pascal, U.S.M.J., staying the within matter until Defendant’s pending Motion to Dismiss (ECF No. 13), and for further relief as the Court may deem proper in this matter.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 1:6-2, Defendant respectfully requests that the Court consider this motion on the papers submitted unless opposition is timely entered, in which case oral argument is requested.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendant will rely upon the attached Letter Brief, Certification of Counsel, and Exhibits.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Discovery End Date: None

Arbitration Date: None

Trial Date: None

**CRUSER, MITCHELL, NOVITZ, SANCHEZ,
GASTON & ZIMET, LLP**

By: /s/ Travis M. Anderson
Travis M. Anderson, Esq.

Dated: August 8, 2025